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OPEN MEETING AGENDA ITEM



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Joint Movants' agreement that was outlined in APS's June 19th filing.

While the Company appreciates Staff's desire to both limit the necessity of cost deferrals and determine which customers will be responsible for the deferral, APS notes that the Company already had agreed to absorb 10% of such costs, and the Commission does not need to make a final decision on the latter issue at this time. Thus, APS urges the Commission to adopt the terms of the June 19, 2015 settlement.

INTRODUCTION

The procedural history of this matter is described in detail in pages 1-3 of the Staff Report. APS will not burden the record by repeating it herein. Suffice it to say that APS filed an Opposition to the Joint Motion submitted by the Joint Movants in November 2014. No action was taken by the Commission with regard to the Joint Motion until Commissioner Little filed a letter in the docket urging APS and the Joint Movants to meet and attempt to come up with a compromise that would allow the AG-1 program to continue until the conclusion of the Company's next general rate case.

THE JUNE 19th SETTLEMENT

After meeting with the Joint Movants on several occasions, APS agreed to withdraw its opposition to the Joint Motion (which had not been opposed by any party other than the Company and the Arizona Investment Council) if (1) APS would be permitted to defer 90% of the net unrecovered generation costs up to \$10,000,000 per the 12-month period beginning July 1, 2016 (and 100% of such costs above \$10,000,000); and 2) the Joint Movants would agree with APS to support an allocation of responsibility for recovery of such deferrals that did not include APS residential customers. Otherwise, such cost responsibility would be determined in the Company's next rate case.

The Joint Movants fully supported this compromise. And just three days later, the Residential Utility Consumers Office filed a supplement to its earlier comments indicating it did not oppose this agreement between APS and the Joint Movants.

APS believed the June 19th Settlement is fair and consistent with the directions 1 contained within Commissioner Little's March 10, 2015 letter. It preserved, for the 2 most part, the status quo as compared to the original terms of the 2012 Settlement 3 pertaining to the AG-1 program. 4 Staff did not agree with either the 90% deferral or the delay in deciding final cost 5 allocation for the deferral. Staff recommends a 50% deferral and proposed that the 6 deferral amount be recovered only from the existing eight AG-1 customers. While the 7 Company understands Staff's position, APS urges the Commission to adopt the June 8 19th settlement. **CONCLUSION** 10 APS urges the Commission to delay a final decision on which customer is 11 responsible for the deferral until APS's 2016 general rate case and adopt the balance of 12 the June 19th settlement. 13 RESPECTFULLY SUBMITTED this 5th day of October 2015. 14 15 Mumey 16 Thomas A. Loquyan 17 Thomas L. Mumaw 18 Attorneys for Arizona Public Service Company 19 ORIGINAL and thirteen (13) copies of the foregoing filed this 5th day of 20 October 2015, with: 21 Docket Control 22 ARIZONA CORPORATION COMMISSION 1200 West Washington Street 23 Phoenix, Arizona 85007 24 COPY of the foregoing delivered/mailed this 5th day of October 2015 to: 25 Dwight Nodes Thomas M. Broderick 26 Chief Administrative Law Judge Director, Utilities Division Arizona Corporation Commission **Arizona Corporation Commission** 27 1200 West Washington 1200 West Washington Phoenix, Arizona 85007 Phoenix, Arizona 85007 28

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